

Exhibit N

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNION DEL PUEBLO ENTERO,) (
et al.) (
Plaintiffs) (
VS.) (CASE NO.
) (5:21-cv-844-XR
) ((LEAD CASE)
GREGORY W. ABBOTT, et al.) (
Defendants) (

OCA-GREATER HOUSTON, et al.) (
Plaintiffs) (
VS.) (CASE NO.
) (1:21-cv-780-XR
) (
JANE NELSON, et al.) (
Defendants) (

HOUSTON AREA URBAN LEAGUE,) (
et al.) (
Plaintiffs) (
VS.) (CASE NO.
) (5:21-cv-848-XR
) (
GREGORY WAYNE ABBOTT, et al.) (
Defendants) (

LULAC TEXAS, et al.) (
Plaintiffs) (
VS.) (CASE NO.
) (1:21-cv-0786-XR
) (
JANE NELSON, et al.) (
Defendants) (

MIFAMILIA VOTA, et al.) (
Plaintiffs) (

VS.) (CASE NO.
) (5:21-cv-0920-XR

GREG ABBOTT, et al.) (
Defendants) (

UNITED STATES OF AMERICA) (
Plaintiff) (

VS.) (CASE NO.
) (5:21-cv-1085-XR

THE STATE OF TEXAS, et al.) (
Defendants) (

ORAL AND VIDEOTAPED DEPOSITION OF
MARIA GOMEZ
APRIL 25, 2023

ORAL AND VIDEOTAPED DEPOSITION OF MARIA GOMEZ,
produced as a witness at the instance of the State
Defendants, taken in the above-styled and numbered
cause on APRIL 25, 2023, between the hours of
10:07 a.m. and 12:17 p.m., reported stenographically by
DONNA McCOWN, Certified Court Reporter No. 6625, in and
for the State of Texas, at La Union Del Pueblo Entero,
1601 US 83 Business, San Juan, Texas, pursuant to the
Federal Rules of Civil Procedure and any provisions
stated on the record or attached therein.

1 vote, but you felt worried about the law and that's why
2 you stopped helping people vote; is that correct?

3 MS. SERNA URIBE: Same objections.

4 A. I decided.

5 Q. Why -- how did you come to that decision?

6 MS. SERNA URIBE: Objection, vague; and
7 objection, calls for speculation.

8 Q. You can answer.

9 A. What was the question I need to answer?

10 Q. How did you come to that decision to stop
11 helping people vote?

12 MS. SERNA URIBE: Same objections.

13 Q. You can answer.

14 A. Because of the restrictions and then under oath
15 and so many things that I didn't understand.

16 Q. Were you -- have you ever read the law -- or
17 the SB 1 law?

18 A. I have heard of it.

19 Q. When you say you've heard of it, where have you
20 heard of it?

21 MS. SERNA URIBE: Objection, vague.

22 Q. You can answer.

23 A. Well, on TV, on the radio, with people.

24 Q. When you went to trainings or meetings with
25 LUPE, did they ever discuss the law?

1 MS. SERNA URIBE: Objection, vague.

2 A. I don't remember.

3 Q. Did you ever communicate your concerns about
4 assisting voters with anybody within LUPE's management
5 or any community organizers or anybody else?

6 MS. SERNA URIBE: Objection, vague.

7 Q. You can answer.

8 A. What's the question?

9 Q. Did you --

10 A. I'm sorry.

11 Q. It's okay. Did you ever share any of your
12 concerns regarding the SB 1 law with anybody in LUPE,
13 any community organizers, any staff?

14 MS. SERNA URIBE: Same objections. Also
15 objection for compound question.

16 A. I don't remember.

17 Q. Before 2021, you used to help people vote; is
18 that correct?

19 MS. SERNA URIBE: Objection, vague.

20 A. Yes.

21 Q. Did those people ever contact you after 2021 to
22 seek your assistance?

23 MS. SERNA URIBE: Objection, vague.

24 A. I don't remember.

25 Q. Did you ever communicate to any people you

1 previously helped vote that you were no longer going to
2 assist them vote?

3 MS. SERNA URIBE: Objection, vague.

4 Q. You can answer.

5 A. Yes, they did ask me.

6 Q. And what was your response?

7 A. I told them that I was not trained anymore to
8 be able to help them.

9 Q. Okay. Ms. Gomez, I want to narrow down what
10 you were no longer trained for. You no longer received
11 any training after SB 1 was passed. Is that your
12 testimony?

13 MS. SERNA URIBE: Objection, vague.

14 Q. You can answer.

15 MS. SERNA URIBE: Objection,
16 mischaracterizes the prior testimony.

17 A. I don't remember.

18 Q. You said you loved helping people or
19 volunteering for LUPE; is that correct?

20 A. Yes.

21 Q. So deciding not to help people vote is a big
22 decision; is that correct?

23 MS. SERNA URIBE: Objection, vague;
24 objection, mischaracterizes prior testimony.

25 Q. You can answer.

1 A. I think that more than anything, it was the
2 fear that that law would be hurting me for me helping
3 people to vote.

4 Q. But what was -- what was the basis of that
5 fear?

6 MS. SERNA URIBE: Objection, vague;
7 objection, calls for speculation.

8 A. I believe to hear the negative things about
9 this law.

10 Q. To your understanding, what were the negative
11 things about the law?

12 MS. SERNA URIBE: Objection, vague; and
13 objection, calls for speculation.

14 A. I don't remember right now, but yes, but I
15 don't remember.

16 Q. Would you go help people to go vote today if
17 you could?

18 MS. SERNA URIBE: Objection, vague;
19 objection, calls for speculation.

20 Q. You can answer.

21 A. Can you ask me again?

22 Q. Would you go help people today to go vote if
23 you could?

24 MS. SERNA URIBE: Same objections.

25 A. If I could, I would think so. Without fear,

1 yes.

2 Q. So what is stopping you? What is the fear
3 stopping you today?

4 MS. SERNA URIBE: Objection, vague.

5 A. The fear that this law is going to affect me
6 personally.

7 Q. Is that -- strike that.

8 When you say this law will affect -- the
9 fear that this law will affect you personally, is that
10 in regards to mail-in voting?

11 MS. SERNA URIBE: Objection, vague.

12 A. Part of it.

13 Q. What parts of the mail-in voting portions of
14 SB 1 worry you?

15 MS. SERNA URIBE: Objection, vague.

16 A. It was a drastic change. We didn't get the
17 voting card to vote through mail. And several people
18 cannot go and vote at the voting polls. That's one of
19 my fears.

20 Q. Your fear is that people were no longer getting
21 mail-in ballots?

22 MS. SERNA URIBE: Objection,
23 mischaracterizes the testimony.

24 A. Yes.

25 Q. Do you know of anybody that requested a mail-in

1 Q. As a volunteer.

2 MS. SERNA URIBE: Objection, vague.

3 A. I take people.

4 Q. You took people to the voting location?

5 A. Some.

6 Q. Did you -- did they ever request help voting?

7 MS. SERNA URIBE: Objection, vague;
8 objection, calls for speculation.

9 A. I have always told them that they have the
10 right to vote, that that's their right. But they know
11 who they vote for -- to vote for.

12 Q. About how many people did you take to the
13 voting locations?

14 A. I don't remember.

15 Q. More than five?

16 A. I think.

17 Q. More than ten?

18 A. I don't remember.

19 Q. So you know it was more than five, but you
20 don't know if it was more than ten?

21 A. Well, I didn't count them.

22 Q. How would you take them to the polling
23 location?

24 MS. SERNA URIBE: Objection, vague.

25 Q. You can answer.

1 A. In my car.

2 Q. How many people fit in your car?

3 A. I don't know.

4 Q. What kind of car do you have?

5 A. Right now, I have a small van.

6 Q. Is that the same van that you had at the --

7 during the last election?

8 A. No.

9 Q. What car did you have during the last election?

10 A. A different one.

11 Q. What kind?

12 A. A van, but I don't know what kind.

13 Q. Do you know how many people fit inside that van

14 at one time?

15 A. You can fit, like, five or six, but I never

16 took that many at the same time.

17 Q. But you made multiple trips. Is that fair?

18 A. On different days.

19 Q. Did you ever have problems transporting anybody

20 to vote?

21 MS. SERNA URIBE: Objection, vague.

22 Q. You can answer.

23 A. No.

24 Q. Back before 2021, you mentioned that you felt

25 at liberty to help people vote; is that correct?

1 A. Yes.

2 Q. And you enjoyed helping people to vote?

3 A. Yes.

4 Q. And did you do that for the whole ten years
5 while you were working for LUPE?

6 A. What do you mean?

7 Q. Did you help people vote for the ten years that
8 you worked at LUPE?

9 A. On my free time.

10 Q. And when you became a volunteer for around
11 eight years, did you help people vote as a volunteer at
12 LUPE?

13 A. Sometimes.

14 Q. So is it fair to say for around at least
15 18 years, you've been helping people vote prior to
16 2021?

17 A. Not fully.

18 Q. For around -- around how long ago did you start
19 helping people vote?

20 A. I don't remember.

21 Q. Ten years ago?

22 A. I believe that before, but I wasn't working nor
23 for LUPE nor for La Union.

24 Q. So it's fair to say, then, it's been over
25 25 years that you've been helping people vote?

1 MS. SERNA URIBE: Objection, vague.

2 A. More or less.

3 Q. And it's your testimony now that because of
4 SB 1 you can no longer do something that you've been
5 doing for over 25 years?

6 MS. SERNA URIBE: Objection,
7 mischaracterizes the testimony.

8 Q. You can answer.

9 A. I think that also -- I mean, I take a lot under
10 consideration my age to be able to help people to vote,
11 my age and the fear for me to do something wrong
12 because of the changes in the law.

13 Q. But you don't know what changes in the law --
14 or you can't point to the changes in law that incites
15 that fear; is that correct?

16 A. Well, those that you have heard, right?

17 Q. Could you describe one of those fears?

18 A. Well, right now, I don't remember one. But my
19 fear right now is about the changes in the law, and
20 that's the one I fear.

21 Q. The fear is strong enough to make you stop
22 helping people vote, and that's something you've been
23 doing for over 25 years; is that correct?

24 A. Well, yes.

25 Q. And what efforts did you take to familiarize

1 yourself with those -- with the law and the
2 restrictions -- alleged restrictions?

3 A. I don't understand the question.

4 Q. What did you do to familiarize yourself with
5 the law and the alleged restrictions that prohibited
6 you and incited fear in you to help people vote?

7 A. I feel that part of it is me, but the fear is
8 about the laws that they changed and the fear of me not
9 being able to understand them because I don't know
10 enough English.

11 Q. Did you talk to anybody at LUPE about the
12 changes and overcoming your fear?

13 MS. SERNA URIBE: Objection, vague.

14 A. Maybe so.

15 Q. And what did they say?

16 A. That's the problem, that I don't remember many
17 of the things that we talked about. And that's why I
18 don't want to go and help the people, because of the
19 same reason.

20 Q. Did -- you said you did not vote by mail in the
21 last election; is that correct?

22 MS. SERNA URIBE: Objection,
23 mischaracterizes testimony.

24 A. I did not vote because I can still go and
25 exercise the right to vote there at the polling place.